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May 13, 2024

Via ECF and E-Mail

Honorable P. Kevin Castel
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Alex Melendez*
20 Cr. 301 (PKC)

*Defendant's submission
date extended to
June 12, 2024,
SO ORDERED
[Signature] U.S.D.J.
5-14-24*

Dear Judge Castel:

As Your Honor is aware, on April 17, 2024, I was appointed counsel to Mr. Alex Melendez in the above-referenced matter, appointed pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. §3006A, to represent him on his application for a sentence reduction pursuant to Amendment 821 of the Sentencing Guidelines. This correspondence is to respectfully request a three-week extension of time to submit a reply to the government's submission.

On April 16, 2024, the Court ordered that the government respond to the defendant's motion for a sentence reduction by May 10, 2024, with the defendant's reply due 14 days after the filing of the government's submission. Since the government submitted its response on May 8, the defense submission is due May 22. We respectfully request an extension of time for the submission of the defendant's reply to June 12, 2024. This request is because we only recently obtained the underlying Pre-Sentence Report and sentencing submissions, and we need the additional time to review the file and meet with the client before preparation of the defense submission.

Based upon my communications with A.U.S.A. Peter J. Davis, the government has no objection to this request for adjournment.

Therefore, for the reasons stated herein, we respectfully request that the Court grant this application and extend the time for submission of the defense reply to June 12, 2024, or any time thereafter convenient to the Court.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

cc: A.U.S.A. Peter J. Davis (via email)